

**KMK** | Keating Muething & Klekamp PLL  
ATTORNEYS AT LAW

RACHAEL A. ROWE  
DIRECT DIA: (513) 579-6486  
FACSIMILE (513) 579-6457  
E-Mail: RRowe@kmlaw.com

September 21, 2005

RECEIVED

Via Facsimile and UPS Overnight Mail

SEP 21 2005

PUBLIC SERVICE  
COMMISSION

Ms. Beth O'Donnell  
Executive Director,  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

Re: Public Notice – Public Service Commission of Kentucky, Case No. 2004-00508 (The Renfro 2 Facility)

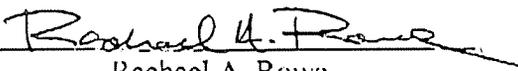
Dear Ms. O'Donnell:

Please find enclosed for filing Memorandum in Opposition to Motion for Hearing or, in the Alternative, to Schedule Hearing After Return to United States of Major Jeffrey Stevens in the above-referenced case. We understand this document can be filed today with the Commission by facsimile, with the original being sent via overnight mail. I have enclosed one original and three copies of the document being filed. Please return file-stamped copies to me in the enclosed self-addressed stamped envelope.

Please call me if you have any questions.

Very truly yours,

KEATING, MUETHING & KLEKAMP, P.L.L.

By:   
Rachael A. Rowe

RAR:kaf  
Enclosure

cc: Major Jeffrey Stevens (via email)  
Loretta S. Rowe  
W. Brent Rice (via email - brice@mmlk.com)

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

SEP 21 2005

PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF CELLCO PARTNERSHIP	)	
D/B/A VERIZON WIRELESS FOR ISSUANCE	)	
OF A CERTIFICATE OF PUBLIC	)	
CONVENIENCE AND NECESSITY TO	)	CASE NO. 2004-00508
CONSTRUCT AN ADDITIONAL CELL	)	
FACILITY ON BURDETTE ROAD, RENFRO	)	
VALLEY, ROCKCASTLE COUNTY,	)	
KENTUCKY (RENFRO II CELL FACILITY)	)	

**MEMORANDUM IN OPPOSITION TO MOTION FOR HEARING  
OR, IN THE ALTERNATIVE, TO SCHEDULE HEARING  
AFTER RETURN TO UNITED STATES OF MAJOR JEFFREY STEVENS**

Intervenors Loretta S. Rowe and Major Jeffrey Stevens oppose the motion of Cellco Partnership d/b/a Verizon Wireless ("Cellco") to set a formal hearing in this matter at this time.

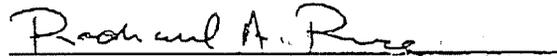
Although Cellco's motion recounts some of the relevant facts, it entirely ignores the Commission's May 26, 2005 Order granting Major Stevens intervenor status in this matter, entitling him to the full rights of a party.

As the Commission and Cellco are aware, Major Stevens, whose newly constructed home is immediately adjacent to the proposed Cellco cell tower site, has been serving this country in Kuwait. (See 4/1/05 Motion to Intervenc.) Major Stevens has a right to be heard at any hearing related to Cellco's application, and the Commission properly has delayed scheduling any hearing pending his return from Kuwait. See 5/26/05 Order at ¶ 2.

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Intervenors Rowe and Stevens respectfully submit that the Commission should deny Cellco's Motion for Hearing and wait to schedule any hearing in the matter until after Major Stevens' safe return from Kuwait, scheduled to occur in or about December, 2005.

Respectfully submitted,



Rachael A. Rowe (86741)  
One East Fourth Street  
Suite 1400  
Cincinnati, Ohio 45202  
Tel: (513) 579-6486  
Fax: (513) 579-6457  
Attorney for Intervenors Loretta S. Rowe  
And Major Jeffrey Stevens

OF COUNSEL:

KEATING MUETHING & KLEKAMP PLL  
One East Fourth Street  
Suite 1400  
Cincinnati, Ohio 45202  
(513) 579-6400

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon W. Brent Rice, McBrayer, McGinnis, Leslie & Kirkland, 201 E. Main Street, Suite 1000, Lexington, Kentucky 40507 by electronic mail, this 21st day of September, 2005.



Rachael A. Rowe